

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

RE: FOZI NASSER) Case No. 22 B 01854
)
)
) Chapter 13
Debtor(s))
) Judge: CAROL A DOYLE

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW Thomas H. Hooper, Chapter 13 Trustee duly appointed to administer the instant case ("Trustee"), and hereby OBJECTS to confirmation of the Chapter 13 plan filed by Debtor(s), in advance of the confirmation hearing set for April 19, 2022 10:30 am, for the following:

Debtor has failed to provide copies of 60 days of pay advices and/or other evidence of income in accordance with 11 U.S.C. §§ 521(a)(1)(B), 1325(a)(1). Debtor to provide proof of self-employment income.

Debtor has failed to properly fill out schedules in accordance with 11 U.S.C. §§ 521(a)(1)(B)(i). Debtor to amend schedule I to show higher income.

Debtor has failed to file a proper plan as required by Section 1325 (a)(1) by failing to properly fill out Section 3.1 to show that he is paying current mortgage.

Debtor has failed to file a proper plan as required by Section 1325 (a)(1) by failing to properly fill out Section 2.3. Debtor to uncheck first box and check the third box and add trustee's preferred tax language.

Debtor has failed to provide copies to the Trustee of the most recently filed tax returns in accordance with 11 U.S.C. §§ 521(e)(2)(A)(i), and 1325(a)(1). Debtor to provide 2017 tax returns.

WHEREFORE, the Trustee prays the Court to enter an Order denying confirmation of the proposed Chapter 13 plan, and for such other and further relief as the Court may deem just and proper. In the alternative, the Trustee requests a hearing on the matter.

Dated: March 22, 2022

/s/ Thomas H. Hooper

Thomas H. Hooper
Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900

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CERTIFICATE OF SERVICE

I, Kelleye Robinson, do hereby certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on the date indicated herein below, I served copies of the foregoing TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN by depositing a copy of the same in a postage-paid envelope with the United States Postal Service or by electronic means, as indicated.

DAVID FREYDIN
Attorney for Debtor

(via CM/ECF)

Patrick Layng
United States Trustee

(via CM/ECF)

FOZI NASSER
7505 KENNETH AVE
SKOKIE, IL 60076
Debtor(s)

(via U.S. Postal Service)

Dated: March 22, 2022

/s/ Kelleye Robinson

Kelleye Robinson
Office of the Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900